

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANDREW BRIDGE, et al.,

Plaintiffs,

v.

OKLAHOMA STATE DEPARTMENT OF
EDUCATION, et al.,

Defendants.

Civil Action No. 5:22-cv-787-JD

Hon. Jodi W. Dishman

**PLAINTIFFS' MOTION FOR PROTECTIVE ORDER AND FOR LEAVE TO
DELAY SUBMISSION OF A NOTICE DISCLOSING LEGAL NAMES**

Pursuant to the Court's Order on January 12, 2024, granting Plaintiffs' Renewed Motion for Leave to Proceed Pseudonymously and Defendants' Motion for Leave to Maintain Filed Parent Declaration Under Initials (Doc. No. 106), Plaintiffs hereby request entry of a Protective Order to preserve the confidentiality of the Pseudonymous Plaintiffs, their parents and next friends, and Defendants' witness R.A. A proposed protective order is attached as Exhibit 1. State Defendants, Defendant Moore Public Schools, and Defendant Noble Public Schools have agreed to the proposed protective order. Plaintiffs' Counsel twice emailed and twice called counsel for Defendants Harding Charter and Defendant

Oklahoma City Public Schools, but they have failed to respond before this Court's deadline.

The Court further granted leave to Pseudonymous Plaintiffs, their parents and next friends, and Defendants' witness R.A. to file under seal a notice to the Court providing their legal names by January 19, 2024. *Id.* Because Plaintiffs must serve opposing counsel with the notice, effectively exchanging the legal names of Pseudonymous Plaintiffs and their parents and next friends, and because "such an exchange is contingent on the Court entering a protective order on confidentiality," *id.*, Plaintiffs respectfully seek leave to delay submission of the notice until after the entry of a protective order by this Court.

Respectfully submitted,

/s/Devraat Awasthi

Devraat Awasthi, OBA No. 35544
Megan Lambert, OBA No. 33216
AMERICAN CIVIL LIBERTIES UNION OF
OKLAHOMA FOUNDATION
PO Box 13327
Oklahoma City, OK 73113
Telephone: (405) 286-1291
dawasthi@acluok.org

Jon W. Davidson (*pro hac vice*)
(admitted only in California)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
120 Broad Street, 18th Floor
New York, New York 10005-3919
Telephone: (323) 536-9880
jondavidson@aclu.org

Paul D. Castillo (*pro hac vice*)
LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.
3500 Oak Lawn Ave., Ste. 500
Dallas, Texas 75219
Telephone: (214) 219-8585
pcastillo@lambdalegal.org

Isaac D. Chaput (*pro hac vice*)
COVINGTON & BURLING LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105
Telephone: (415) 591-6000
ichaput@cov.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2024, I electronically filed Plaintiffs' Motion for Protective Order and for Leave to Delay Submission of a Notice Disclosing Legal Names with the Clerk of Court via the Court's CM/ECF system, which effects service upon all counsel of record.

/s/ Devraat Awasthi

Devraat Awasthi
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF OKLAHOMA
P.O. Box 13327
Oklahoma City, OK 73113
Tel.: (405) 286-1291
dawasthi@acluok.org

Counsel for Plaintiffs